

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CASSAVA SCIENCES, INC.,

Plaintiff,

v.

DAVID BREDT, GEOFFREY PITT,  
QUINTESSENTIAL CAPITAL  
MANAGEMENT LLC, ADRIAN HEILBUT,  
JESSE BRODKIN, ENEA MILIORIS and  
PATRICK MARKEY,

Defendants.

Case No. 1:22-cv-09409-GHW-OTW

**DEFENDANTS DR. JESSE BRODKIN, DR. ADRIAN HEILBUT, AND  
DR. ENEA MILIORIS'S NOTICE OF MOTION TO DISMISS  
THE SECOND AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that Defendants Dr. Jesse Brodtkin, Dr. Adrian Heilbut, and Dr. Enea Milioris (the "Dot.com Defendants"), by their undersigned counsel, hereby move this Honorable Court for an Order, pursuant to Federal Rules of Civil Procedure 12(b)(6) and 8, dismissing with prejudice Plaintiff's Second Amended Complaint (Dkt. 120) in its entirety and granting such other relief as the Court deems just and proper. The Dot.com Defendants will rely upon the Memorandum of Law and Appendix 1, submitted herewith, as well as any further briefing and argument presented.

In accordance with this Court's Individual Rule of Practice III.a, this motion is made following the conference of counsel, which took place on June 17, 2024. Plaintiff declined an opportunity to amend. The parties have agreed to the following proposed briefing schedule and page limits:

- Plaintiff's opposition of up to 50 pages is due **August 2, 2024**; and

- Defendants' reply of up to 20 pages is due **August 23, 2024**.

Dated: June 28, 2024  
New York, New York

CLARICK GUERON REISBAUM LLP

By: /s/ Isaac B. Zaur  
Isaac B. Zaur  
David Kumagai  
220 Fifth Avenue, 14th Floor  
New York, New York 10001  
(212) 633-4310  
izaur@cgr-law.com  
dkumagai@cgr-law.com

LAW OFFICE OF DANIEL F. WACHTELL

By: /s/ Daniel F. Wachtell  
Daniel F. Wachtell  
90 Broad Street, 23rd Floor  
New York, New York 10004  
(917) 667-6954  
dan@danwachtell.com

*Attorneys for Defendants Dr. Jesse Brodtkin,  
Dr. Adrian Heilbut, and Dr. Enea Milioris*